

RANDALL S. LUSKEY (SBN: 240915)

rluskey@paulweiss.com

**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**

535 Mission Street, 24th Floor

San Francisco, CA 94105

Telephone: (628) 432-5100

Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)

ratkins@paulweiss.com

CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)

cgrusauskas@paulweiss.com

ANDREA M. KELLER (*Pro Hac Vice* admitted)

akeller@paulweiss.com

**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**

1285 Avenue of the Americas

New York, NY 10019

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

Attorneys for Defendants

UBER TECHNOLOGIES, INC.;

RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

M.C. v. Uber Technologies, Inc., et al.

Case No.: 3:24-cv-03608-CRB

**DEFENDANTS AND CROSS-
CLAIMANTS UBER TECHNOLOGIES,
INC.; RASIER, LLC, AND RASIER-CA,
LLC'S REQUEST FOR
ADMINISTRATIVE RELIEF FROM
SERVICE DEADLINE (Local Rule 7-11);
[PROPOSED] ORDER**

1 On November 5, 2024, Defendants/Cross-Claimants Uber Technologies, Inc., Raiser, LLC, and
2 Raiser-CA, LLC (collectively, “Uber”) filed their Cross-Claims against Cross-Defendant Desalegne
3 Nega. Fed. R. Civ. P. 4(m) provides ninety (90) days for service of a complaint. *See* Fed. R. Civ. P.
4 4(m) (“If a defendant is not served within 90 days after the complaint is filed, the court--on motion or
5 on its own after notice to the plaintiff--must dismiss the action without prejudice against that defendant
6 or order that service be made within a specified time. But if the plaintiff shows good cause for the
7 failure, the court must extend the time for service for an appropriate period.”).

8 Cross-Claimants have been diligently attempting to serve Cross-Defendant, Desalegne Nega,
9 with the Summons and Cross-Claims. But, to date, Cross-Defendant has not yet been served in this
10 matter.

11 Cross-Claimants respectfully request the Court grant a 60-day extension to complete service or
12 take other appropriate action regarding Cross-Defendant. Good cause exists for this Court to extend
13 the service deadline because Cross-Claimants have been diligently attempting to serve Cross-
14 Defendant.

15 Cross-Claimants, through attorneys of record Shook, Hardy & Bacon, hired First Legal, a legal
16 solutions firm, to assist with locating and serving Cross-Defendant. The process server first attempted
17 to serve the Cross-Defendant at 5415 W. Harmon Ave., Unit 2004, Las Vegas, NV 89103-7014. The
18 process server indicated an occupant of that address stated Cross-Defendant does not live there, but
19 may live nearby in another unit in the same apartment complex. The occupant did not identify herself.

20 Cross-Claimants, through attorneys of record Shook, Hardy & Bacon, obtained a new Accurant
21 report to locate an updated address for Cross-Defendant. That report indicated Cross-Defendant’s
22 current address was 5415 W. Harmon Ave., Unit 2004, Las Vegas, NV 89103-7014. Cross-Claimants,
23 through attorneys of record Shook, Hardy & Bacon, then requested that First Legal locate an updated
24 address for Cross-Defendant, and First Legal likewise determined that based on all indications the
25 subject was still at 5415 W. Harmon Ave., Unit 2004, Las Vegas, NV 89103-7014. First Legal believed
26 the occupant with whom its process server spoke may have been Cross-Defendant’s wife.

27 First Legal attempted to serve the Cross-Defendant at 5415 W. Harmon Ave., Unit 2004, Las
28 Vegas, NV 89103-7014 three additional times. The process server indicated no one came to the door

1 on the first two attempts, but on the third attempt, which was on January 29, 2025, an occupant
2 answered the door and stated that Cross-Defendant no longer lives there, that she does not know him,
3 and that she only recognized his name from mail that still arrives at that address.

4 On January 29, 2025, First Legal identified a new address at which Cross-Defendant may be
5 located, which is 8215 Stoneheather Ct., Las Vegas, NV 89117. Uber plans to return the prior summons
6 as unexecuted and file a new Proposed Summons if this motion is granted.

7 Cross-Claimants respectfully request the Court grant a 60-day extension to complete service on
8 Cross-Defendant (or take appropriate action), allowing to and including April 4, 2025 to effect service.

9 DATED: February 3, 2025

Respectfully submitted,

10 **SHOOK, HARDY & BACON L.L.P.**

11 By: /s/ Maria Salcedo

12 MARIA SALCEDO

13 MARIA SALCEDO (Admitted *Pro Hac Vice*)

14 msalcedo@shb.com

15 **SHOOK, HARDY & BACON L.L.P.**

16 2555 Grand Blvd.

17 Kansas City, MO 64108

18 Telephone: (816) 474-6550

19 Facsimile: (816) 421-5547

20 *Attorney for Defendants*

21 UBER TECHNOLOGIES, INC.,

22 RASIER, LLC, and RASIER-CA, LLC